



August 5, 2022

Comment to Accompany Community Reinvestment Act Joint Notice of Proposed Rulemaking
Agency name: Office of the Comptroller of the Currency (OCC)
Docket ID: OCC-2022-0002

To whom it may concern:

On behalf of Braven, a national nonprofit in the college to career space, I appreciate the opportunity to comment on the Notice of Proposed Rulemaking regarding updates to the Community Reinvestment Act (CRA). Braven's mission is to empower college students from underserved backgrounds (low-income individuals, first-generation college students, Pell grant recipients, etc.) to attain career-accelerating opportunities that put them on the path to economic mobility. Our mission is aligned with the underlying intent of the CRA to encourage investment in low- and moderate-income individuals to enhance equity and pathways to mobility.

Current CRA standards require banks defined as intermediate or large to undergo evaluations based on both a lending test and a community development test. This includes community development lending, qualified investments, and community development services, which by definition must have a primary purpose of community development. This important requirement has driven billions of dollars into communities that are historically underserved.

This notice of proposed rulemaking would in many ways enhance the existing rule, particularly with regard to community development services. The proposed rule's broadening of the list of services in Section III should be celebrated. In particular, Braven strongly supports the recommendation to move workforce development and job training programs out of the economic development component and into the community supportive services classification. This would allow banks to support workforce development and job training outside of just the financing of small businesses and farms, broadening the impact on communities. Organizations of all sizes and types are doing great work in local workforce development, and banks should be encouraged to support them.

The current draft defines community supportive services as "general welfare activities that serve or assist low-or moderate-income individuals, such as childcare, education, workforce development and job training programs, health services, and housing services programs. While Braven supports efforts to define community supportive service categories in the new rule, we would urge the agencies to broaden the list to include "higher education career courses or programming." Models like ours embed in institutions of higher education to assist with community workforce development efforts, and it should be clear that this model is an eligible community support service for the purpose of CRA consideration.

In addition, Braven celebrates the proposal in Section IV to maintain a publicly available list of activities eligible for CRA consideration, but also to make it clear that this list is non-exhaustive. We support efforts to provide a standardized approval process for banks to confirm eligibility of community development activities in advance of any action to provide clarity and to give banks the flexibility to serve their communities in a myriad of ways.

Efforts to encourage volunteer activities by using a metric to measure the hours of community development services for large banks by activity per full time employee is another important component of this rule that would elevate communities. We would encourage this metric to apply in both metropolitan and nonmetropolitan areas.

Finally, we would discourage any reclassification of asset categories such that community development financing would be diminished. This would include making the community development finance and service tests optional for intermediate banks and reclassifying 779 ISB banks as small banks such that they are no longer accountable for community development financing requirements.

Thank you for your consideration of these comments and your important work to make the most significant updates to this rule in over twenty years.

Sincerely,

Shannon Hossinger
Director of Public Policy, Braven